

LINOWES
AND BLOCHER LLP
ATTORNEYS AT LAW

February 16, 2012

C. Robert Dalrymple
301.961.5208
bdalrymple@linowes-law.com
Heather Dlhopsky
301.961.5270
hdlhopsky@linowes-law.com

VIA EMAIL AND HAND DELIVERY

Mr. Jeremy Hurlbutt
City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850

Re: Twinbrook Metroplace, Project Plan Application No. PJT2012-00002 (the "Application")
– Supplemental Parking Information

Dear Mr. Hurlbutt:

On behalf of Twinbrook Partners LLC and The Northwestern Mutual Life Insurance Company (collectively the "Applicant") and in response to a request for more information expressed by the City's Planning Commission (the "Planning Commission") at the Planning Commission hearing on the Application on January 25, 2012, we are submitting this supplemental information in support of the parking reduction that has been requested as part of the Application.

The Application proposes redevelopment of 1592 Rockville Pike (the "Property") in order to transform the outdated existing single-story commercial uses and surface parking into a transit-oriented, mixed-use "destination location" (the "Project"). The Property is located adjacent the Twinbrook Metro Station and is zoned MXTD. The Project's proposed development program is comprised of 162,000 square feet of office, 39,000 square feet of retail, 14,000 square feet of restaurant space (plus 2,500 square feet of outdoor seating), 36,000 square feet of health club uses, a 190-room hotel, and up to 811 multi-family residential units. Per Section 25.16.03(d) of the City's Zoning Ordinance, the maximum allowable parking for the project is 2,199 parking spaces (as reflected in the Development Data Table on the Project Plan submitted with the Application). In the MXTD zone, the number of parking spaces to be provided is limited to no more than the standard referenced above. The maximum parking limit may be further adjusted by a shared use reduction that is applied to mixed-use projects pursuant to the appropriate percentages set forth in Section 25.16.03(h)(6) of the Zoning Ordinance, thereby allowing the maximum number of parking spaces to be reduced from 2,199 spaces to 1,602 spaces. This is not a parking waiver, but as defined in this section of the Zoning Ordinance is a **parking credit** that is applied to the parking maximum to reflect the parking economies achieved in mixed-use projects with differing peak demand times.

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Given that Section 25.16.03(f) mandates parking **maximums** in the MXTD zone and Section 25.16.03(h)(6) provides for parking **credits** for mixed-use projects regardless of the zone, it follows that a reduction through a parking waiver is merited in this case due to the Project's direct adjacency to the Twinbrook Metro Station and for the reasons enumerated below. To this end, the Applicant seeks a reduction pursuant to Section 25.16.03(h)(1) of the Zoning Ordinance to permit provision of 1,278 parking spaces for the Project (20.2% fewer parking spaces than would otherwise be permitted for the Project, once the shared use reduction is applied). In approving a Project Plan in the MXTD Zone, the Mayor and Council have the authority to reduce the number of parking spaces for uses in the Project provided that:

- (a) *A major point of pedestrian access to such building or buildings is within seven-tenths of a mile (3,696 feet) walking distance of a transit station entrance shown on the Washington Metropolitan Area Transit Authority Adopted Regional Rail Transit System; or*
- (b) *There are three (3) or more bus routes in the immediate vicinity of the building or buildings; or*
- (c) *There is a major public parking facility available to the public within 1,000 feet of a building entrance; or*
- (d) *Where the size of the lot is so small that meeting the parking requirement would prevent redevelopment; or*
- (e) *Where there is a bikeway in close proximity to the site and the applicant demonstrates that the uses in the proposed development are conducive to bicycle use; or*
- (f) *For any other good cause shown.*
[Emphasis added.]

While the Mayor and Council could approve the request for a reduction upon a finding that any one of the criteria set out above are satisfied, the Project satisfies four of these criteria (subsections (a), (b), (c), and (f)) as follows:

- (a) A major point of pedestrian access to the Project is located approximately 600 feet from the entrance to the Twinbrook Metro Station. Furthermore, the entire Property is located within a quarter-mile radius of the Twinbrook Metro Station. The Applicant anticipates that a significant number of the Project's residents, employees, and visitors will utilize the Twinbrook Metro Station's Red Line to travel to and from the Property, thereby reducing the number of parking spaces that are needed in the Project; and
- (b) Several Metrobus and RideOn bus routes are located in the immediate vicinity of the Project, and the Project is served by conveniently located bus stops. In addition, the

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Twinbrook Metro Station is a hub for numerous Metrobus and RideOn bus lines that effectively and efficiently link the Project to the rest of the region. Therefore, the Project is well-served by Metro, Metrobus, and RideOn bus, all of which will serve to further reduce the demand for parking within the Project itself; and

- (c) A WMATA public parking facility fewer than 1,000 feet from a Project entrance is being constructed in conjunction with The JBG Companies' adjacent Twinbrook Station project. It is anticipated that this public garage will be completed prior to construction of the Project, thus allowing immediate use by Project users and again lessening the need for maximum parking for the Project; and
- (f) The Project is a model transit-oriented development with excellent proximity to Metro and bus service. Consistent with the fundamental principles of "smart growth," which the Project undoubtedly is, use of single occupancy vehicles by users of a project must be discouraged, and trip reduction measures favoring transit use and other forms of transportation other than the car are critically important. Limiting parking, especially for projects immediately adjacent to mass transit stations, is a basic component to any trip reduction strategy.

In addition, available Metro ridership data indicates that transit (both Metro and bus) ridership has significantly increased within the past few years, and it is anticipated that higher gas prices (and perhaps increases in a gas tax) and traffic along Rockville Pike will serve to further increase transit usage. It is also widely recognized that code-required parking rates far exceed actual usage in transit-proximate areas, as illustrated locally by the fact that Montgomery County, based upon professional studies conducted, is significantly reducing its parking requirements under its transit zones (the CR Zone being the newest zone for commercial/residential areas located near transit) as well as through its Zoning Ordinance re-write process across all zones.

There is precedent in prior City approvals for significant parking reductions in mixed-use, transit-proximate projects, as most recently exemplified with the Rockville Metro Plaza project in which the Planning Commission approved a reduction in parking provided by 45% from that which would otherwise be required under Section 25.16.03(d). [In that instance, the applicant did not apply the shared use reduction.] The Applicant has researched other precedent projects as well, and indications are that the 51 Monroe Street project provides fewer than 50% of the number of spaces than would otherwise be required, and several projects in the vicinity of Fishers Lane (near the Project though not located within the City) provide between 25-46% fewer parking spaces than would otherwise be required. As such, the parking reduction requested by the Applicant (20.2% with shared parking considered or 42% if shared parking is not



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considered) is consistent with precedents well-established for similar projects to this Project.

Finally, it should be noted that the Applicant has a vested interest in providing the ideal balance of parking that will be required to meet market demand, without over-providing parking and thus taking up unnecessary space within the Project and exponentially increasing construction costs (this also being a heavily scrutinized subject in negotiating the financing of a project with potential lenders). As a result, applicants typically spend significant time and money in advance of the entitlement processes on market studies and parking analyses to determine the exact point at which a project will satisfy parking demand without wasting resources on over-parking. In this case, the Applicant's conclusions are that the proposed 1,278 parking spaces to be provided represents the ideal balance between the number of spaces that the mixed-use market demands and fostering both the Applicant's and the City's goals for transit-oriented development and its associated efficiencies.

For all of these reasons, approval of the Applicant's parking reduction request by the Mayor and Council (and allowance of the shared parking reduction) will constitute good and sound public policy. Thank you for your consideration of the Application and this supplemental information regarding the requested parking reduction. Please contact us should you have any questions or require any additional information.

Very truly yours,

LINOWES AND BLOCHER LLP

C. Robert Dalrymple, H.D.

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Heather Dlhopsky

Heather Dlhopsky

cc: Mr. Bobby Ray
Mr. Jim Alexander
Mr. Tim Eden
Ms. Ines Vega
Mr. Daniel Ashtary
Ms. Nancy Randall